

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

SHANTE REESE,

Plaintiff,

CASE NO.: 1:23-cv-24670-JAL

v.

ALORICA, INC.,

Defendant.

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JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINE

Plaintiff, SHANTE REESE (“Plaintiff”), and Defendant, ALORICA, INC., (“Defendant”) (collectively, “the Parties”), hereby jointly move this Court for a sixty (60) day extension of the discovery deadline contained in the Scheduling Order [ECF No. 23], and in support state as follows:

1. The Scheduling Order sets this case for trial on the Court’s two-week trial calendar beginning on February 10, 2025, and provides the following pertinent pre-trial deadlines:

- a. May 27, 2024 — discovery completion deadline;
- b. July 10, 2024 — expert discovery deadline;
- c. September 12, 2024 — mediation completion deadline;
- d. September 26, 2024 — filing of dispositive pre-trial motions and memoranda of law deadline;
- e. January 17, 2025 — filing of motion in limine deadline; and
- f. January 17, 2025 — filing of joint pre-trial stipulation.

2. The Parties have acted diligently to attempt to meet those deadlines. The Parties are currently engaged in the discovery process, which is proving to be more complex and time-consuming than initially anticipated due to the detailed nature of the case.

3. Pursuant to Fed. R. Civ. P. 16(b)(4) and S.D. Fla. Local Rule 7.1(a)(1)(J), parties must show good cause to modify the Scheduling Order [ECF No. 23] in this case.

4. In the instant case, good cause exists to extend the discovery deadline in order to permit both parties to conduct discovery.

5. It is the intention of the Parties to conduct a thorough and comprehensive discovery process and the Parties require additional time for the discovery period than the Parties originally requested at the outset of the case.

6. In light of these circumstances, the Parties propose that the discovery deadline be extended to July 26, 2024, which represents a sixty (60) day extension from the current deadline.

7. This motion is filed jointly, reflecting the agreement of both parties that extending the discovery deadline is necessary for the thorough and fair resolution of this case. Moreover, neither party will be prejudiced by the extension.

8. The Court will also not be inconvenienced as the “overall purpose of discovery under the Federal Rules is to require the disclosure of all relevant information so that the ultimate resolution of disputed issues in any civil action may be based on a full and accurate understanding of the true facts, and therefore embody a fair and just result.” *Weiss v. Standard Ins. Co.*, No. 08-80712-CIV, 2009 WL 1833963, at *2 (S.D. Fla. June 25, 2009) (citing *U.S. v. Proctor & Gamble Co.*, 356 U.S. 677, 682 (1958)). Further, the Federal Rules “strongly favor full discovery whenever possible.” *Farnsworth v. Procter & Gamble Co.*, 758 F.2d 1545, 1547 (11th Cir. 1985)

9. This extension will provide both parties with the necessary time to complete discovery adequately without unduly delaying the proceedings.

10. This is the first request for an extension of any pre-trial deadlines in the case. This request is not made for the purpose of causing delays and if granted, will serve the interests of justice by ensuring that both parties have the opportunity to conduct a complete and thorough discovery process.

CONCLUSION

WHEREFORE, Plaintiff, SHANTE REESE, and Defendant, ALORICA, INC., respectfully request that the Court enter an order extending the discovery deadline by sixty (60) days, as set forth herein, as well as any other relief the Court deems equitable, just, and proper.

Dated: April 2, 2024

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC

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